

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NANOCO TECHNOLOGIES LTD.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 2:20-cv-38
	)	
SAMSUNG ELECTRONICS CO., LTD.,	)	
SAMSUNG DISPLAY CO., LTD.,	)	<b>JURY TRIAL DEMANDED</b>
SAMSUNG ADVANCED INSTITUTE OF	)	
TECHNOLOGY,	)	
SAMSUNG ELECTRONICS CO., LTD.,	)	
VISUAL DISPLAY, and	)	
SAMSUNG ELECTRONICS AMERICA,	)	
INC.	)	
	)	
Defendant	)	

**STIPULATION**

IT IS HEREBY STIPULATED AND AGREED, by and between plaintiff Nanoco Technologies Ltd. (“Nanoco”) and defendants Samsung Electronics Co., Ltd., Samsung Display Co., Ltd; Samsung Advanced Institute of Technology; Samsung Electronics Co., Ltd. Visual Display; and Samsung Electronics America as follows:

- Nanoco filed suit against Samsung Electronics Co., Ltd., Samsung Display Co., Ltd; Samsung Advanced Institute of Technology; Samsung Electronics Co., Ltd. Visual Display; and Samsung Electronics America on February 14, 2020, Case No. 2:20cv38.
- Samsung Electronics Co., Ltd. (“SEC”) represents that Samsung Advanced Institute of Technology (“SAIT”) merged with SEC in 2008 and is now a business division of SEC.
- SEC represents that it obtained documents from SAIT when the companies merged in 2008, and that SEC will not object to the production of any SAIT documents currently in

its possession, custody, or control based on the fact that SAIT will not be a named party to the case.

- SEC represents that Samsung Electronics Co., Ltd, Visual Display (“SEC Visual Display”) is a business division of SEC and not a stand-alone entity.
- SEC stipulates that, if discovery uncovers that SAIT or SEC Visual Display should have been separately named in the complaint, none of SEC, Samsung Display Co., Ltd. (“SDC”) or Samsung Electronics America (“SEA”) will oppose amending to add SAIT or SEC Visual Display back into the case. SEC further stipulates that if SAIT or SEC Visual Display needs to be added back into the case, SEC will agree to accept service on behalf of those business divisions and not request an extension to the schedule based on their addition.
- Based on these representations, Nanoco stipulates that it will file a notice of dismissal without prejudice for SAIT and SEC Visual Display and request that these names be removed from the case caption.

SO STIPULATED.

Dated: May 28, 2020

/s/ Claire Abernathy Henry

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on May 28, 2020, to all counsel of record who are deemed to have consented to electronic service per Local Rule CV-5(a)(3).

/s/ Melissa R. Smith

Melissa R. Smith